

**Before the
COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**Inquiry by the Department of Telecommunications
and Energy pursuant to Section 271 of the
Telecommunications Act of 1996 into the Compliance
Filing of New England Telephone and Telegraph Company
d/b/a Bell Atlantic-Massachusetts as part of its application
to the Federal Communications Commission for entry into
the in-region interLATA (long distance) telephone market**

D.T.E. 99-271

MOTION FOR HIGHLY SENSITIVE CONFIDENTIAL TREATMENT

Z-Tel Communications Inc. (“Z-Tel”), by its attorneys, and pursuant to paragraph 5 of the Protective Order adopted in the above-referenced proceeding on October 2, 1999 and G.L. c. 25, § 5D, hereby respectfully requests that the Department of Telecommunications and Energy (“Department”) classify as “highly sensitive confidential information” the materials submitted contemporaneously herewith by Z-Tel.

The information for which highly confidential treatment is requested would provide competitors insight into Z-Tel’s internal procedures and processes with regard to its business relationship and interaction with Bell Atlantic-Massachusetts and with its customers. Because this information is of such a sensitive, confidential, and strictly proprietary nature, access to and copying of the information by its competitors and potential competitors would expose Z-Tel to an unreasonable risk of harm. Accordingly, Z-Tel requests that the Department refrain from permitting the production of this information to any participants in this proceeding or to any other entities.

Wherefore, Z-Tel respectfully requests that the information filed contemporaneously herewith and designated by Z-Tel as “highly sensitive confidential information” be so classified by the Department.

Respectfully submitted,

Z-TEL COMMUNICATIONS, INC.

By: _____

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